

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-06-031

Greif Industrial Packaging & Services
7425 Industrial Road, Florence, KY 41042

Date October 16, 2006

Sajjad Quabili

SOURCE I.D. #:	021-015-00010
SOURCE A.I. #:	272
ACTIVITY #:	APE20050002

SOURCE DESCRIPTION:

An operating permit application was received from Greif Industrial Packaging & Services on February 24, 2005 and was completed on December 2, 2005. Greif operates a metal drum manufacturing plant in Florence, Kentucky.

PUBLIC AND U.S. EPA REVIEW:

On September 7, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Boone County Recorder*. The public comment period expired 30 days from the date of publication.

Comment received

Comments were received from Greif Industrial Packaging & Services on September 25, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Greif Industrial Packaging & Services Draft Title V Air Quality Permit submitted by Nick Sheets, EH & S Manager.

1. Emissions Summary Table - the potential (tpy) is the same as the actual (tpy) for Formaldehyde, Ethylene glycol ether, propylene glycol monopropyl ether, Ethylene Glycol, and Methyl alcohol. Why?

Division's response: Currently, actual emission data for the above mentioned VOCs are not available in the Division's emission inventory system. So, the actual emissions are assumed to be equal to the potential to emit until the Division gets some accurate annual emission data for the above mentioned VOCs.

2. Applicable Regulations - the draft references 401 KAR 61:132, Section 3 for VOC content. Under #2 it states "Less than 3.0 lb/gal, excluding water or exempt solvent or both,...". This should reference the same regulation but the one for forced air systems for items exposed to outdoors or harsh environments: "(b) Less than 0.42 kg/l of coating (three and five-tenths (3.5) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with air or forced air-dried items or items subject to outdoor or harsh exposure or extreme environmental conditions;"

Division's response: Comments acknowledged, changes made.

3. Permit Statement of Basis - Page 2, Applicable Regulations - Same issue as explained above in #2.

Division's response: Comments acknowledged, changes made.

4. Section B (page 5 of 28) - a. Where did the limit of 2.58 lb/hr originate from?

Division's response: 401 KAR 61:020 is applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulate, commenced before July 2, 1975. The maximum allowable emission rate for particulate is 2.58 lb/hr (Appendix A to 401 61:020)

5. Section B (page 5 of 28) - b. We have no recorded visible emissions from any steel drum facility in North America. Is there any alternative to this inspection or can we have some type of compliance period which we perform the inspections and if there are no visible emissions recorded, we can request that this requirement be dropped?

Division's response: Comments acknowledged, changes made.

6. Section B (page 5 of 28) - d. Same issue as explained above in #2.

Division's response: See Division's response in Item #2. Changes made.

7. Section H (page 25 of 28) - NESHAP Requirements: 63.3891(a). It states ".. that each thinner and/or other additive, and cleaning material used contains no organic HAP." Shouldn't a facility be allowed to use a thinner, additive or cleaning material that is 2.6 lbs HAP/ gallon solids or less like any other material if using this compliance option?

Division's response: Per 40 CFR 63.3891(a) compliant material option, the permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. These requirements are incorporated in the permit as an alternate method. If the permittee wants to use thinner and/or other additive, and cleaning material containing organic HAP, then primary operating scenario must be used.

8. Section H (page 25 of 28) - NESHAP Requirements: 63.3941. Same issue as explained in #7 above.

Division's response: Same as in Item #7 above.